

**SUPPRESSED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA, )  
                                )  
Plaintiff,                 ) CRIMINAL NO. 22-CR-40007-JPG  
v.                            )  
MICHAEL E. PIERCE,         ) Title 18, United States Code, Sections  
                                )  
Defendant.                 ) 922(g)(1) and 924(d)

**FILED**

INDICTMENT

APR 05 2022

THE GRAND JURY CHARGES:

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
BENTON OFFICE

COUNT 1

FELON IN POSSESSION OF A FIREARM

On or about September 17, 2021, in Williamson County, Illinois, within the Southern District of Illinois, the defendant

MICHAEL E. PIERCE

knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that is a Springfield Armory XDM 9mm semi-automatic handgun, said firearm having been shipped or transported in interstate or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

FIREARM FORFEITURE ALLEGATION

1. The allegations contained in Count 1 above are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the above offense in violation of Title 18, United States Code, Section 922(g), the defendant

MICHAEL E. PIERCE

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearm and ammunition involved or used in the knowing commission of the offense, including, but not limited to:

a Springfield Armory XDM 9mm semi-automatic handgun, bearing serial number MG847294, and all ammunition contained therein;

all pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

A TRUE BILL.



  
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STEVEN WEINHOEFT  
Date: 2022.04.04  
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**STEVEN D. WEINHOEFT**  
United States Attorney

  
**CASEY E. A. BLOODWORTH**  
Assistant United States Attorney

Recommended Bond: Detention